



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

March 13, 2017

Mr. Nicholas Emrath
1069 Countess Ln.
Spring Hill, TN 37174

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT #9176 9008 9111 3808 8375

Subject: Compliance Evaluation Inspection
City of Spring Hill Municipal Separate Storm Sewer System
NPDES Permit TNS080055
Maury County, Tennessee

Dear Mr. Emrath,

This correspondence addresses your concerns regarding compliance by the City of Spring Hill with its Municipal Separate Storm Sewer System (MS4) permit. On January 19, 2017, Division personnel conducted an inspection of the Construction Stormwater portion of the City's MS4 program. A copy of our letter to the City is included for your records. As a result of inspection findings the Division has requested a Corrective Action Plan to address documentation of various aspects of the Construction Stormwater program.

We appreciate your concern for clean and safe water in Tennessee. If you require additional information, please contact Ms. Christy Morgan at (615) 532-0685 or by e-mail at Christina.D.Morgan@tn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jessica Murphy".

Jessica Murphy, Manager
Compliance and Enforcement Unit

Case File WPC16-0089



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE

1421 HAMPSHIRE PIKE
COLUMBIA, TENNESSEE 38401
PHONE (931) 380-3371 STATEWIDE 1-888-891-8332 FAX (931) 380-3397

March 1, 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
91 7199 9991 7036 3800 7259

Mr. Victor Lay
City Administrator
City of Spring Hill
P.O. Box 789
Spring Hill, Tennessee 37174

Re: Compliance Evaluation Inspection
City of Spring Hill Municipal Separate Storm Sewer System
NPDES Permit Tracking Number TNS080055
Maury County, Tennessee

Dear Mr. Lay:

On January 19, 2017, Bryan Pope, Steven Turaski, Robbie Karesh, and Christina Morgan of the Division of Water Resources (DWR) performed a Compliance Evaluation Inspection (CEI) of the Municipal Separate Storm Sewer System (MS4) program for the City of Spring Hill. We met with Chris Dugan and Brad Dilling who provided information during the inspection. The purpose of the inspection was to evaluate the program's compliance with its permit conditions and was limited to the Construction Stormwater element of the City's program.

The City of Spring Hill has coverage under the *National Pollution Discharge Elimination System (NPDES) General Permit for discharges from Small Municipal Separate Storm Sewer System (MS4)*, permit tracking number TNS08055. The NPDES General Permit MS4 became effective on April 8, 2011, and was administratively extended beyond the expiration date of September 1, 2015. The MS4 permit was reissued on October 1, 2016, and the division is currently reviewing the City's Notice of Intent (NOI) to be covered under the reissued permit.

Ordinances, Policies and Construction Site Inventory and Tracking

For the purposes of the CEI, the division reviewed the City of Spring Hill's most recent annual report, stormwater ordinance and policies, enforcement response plan (ERP) and construction activity inventory and tracking systems.

General Findings:

1. The City of Spring Hill MS4 has adopted the TDEC Erosion and Sediment Control Handbook, and the TDEC Guide to the Selection and Design of Stormwater BMPs to meet the permit requirements specified in section 4.2.4(c). While useful in meeting the requirements specified in section 4.2.4(b), the MS4 should clarify its requirements related to design storm and special conditions by citing the current Tennessee Construction General Permit and/or segments therein.
2. The current inventory of construction activities allows general tracking, but should include a measurable means of documenting each activity from initiation to completion, as specified in 4.2.4(d).

Plan Review and Approval Procedures

The City of Spring Hill MS4 currently contracts with Dempsey Dilling and Associates for construction site plan review and approval services. The division was provided several examples of approved construction site plans, both during the CEI and afterwards by follow-up correspondence, which were used to evaluate the City's plan review process and determine if all requirements for construction site design were met.

General Findings:

1. The approved construction site plans referenced above demonstrate that requirements for construction site design are being met. However, the procedures for the plans review and approval process were not specified as required in section 4.2.4(f), and documented in the Stormwater Management Plan (SWMP). A written compilation of all elements of the construction site stormwater runoff pollutant control program must be included in the SWMP.
2. Construction site plan reviewers held current training certifications as required by section 4.2.4(i).

Pre-Construction Meetings and Construction Site Inspections

The CEI included a desktop review of inspection procedures, and a joint site visit of two active construction sites with the City of Spring Hill's MS4 personnel, Chris Dugan and Brad Dilling. The first site was Spring Hill Assisted Living (TNR181908) and the second was Depot Place (TNR181953).

Observations and Recommendation

1. Although inspections are being performed as required in section 4.2.4(h), procedures for evaluation and documentation of site compliance have not been documented.
2. Pre-construction meetings are being held with construction-site operators as required in section 4.2.4(j), but the meetings are not consistently documented.
3. Construction inspection staff held current training certifications as required in section 4.2.4(i).

4. Inspections must evaluate all aspects of construction site compliance, including the proper installation and maintenance of EPSCs specified in the approved site plan.

The City has established a construction stormwater program. However, the City has not specified and documented procedures for construction site plans review, site inspections, and/or enforcement actions.

As a result, the Division of Water Resources requests that the City of Spring Hill develop a corrective action plan (CAP) that specifies the steps that will be taken to correct the abovementioned deficiencies. The CAP must be submitted to the division within 60 days of the receipt of this CEI letter, and include milestones and related timeframes.

Again, I would like to thank you and your staff for the assistance and courtesy extended during the inspection. If you have any questions or need additional information, please contact me at (931) 722-9592.

Sincerely,

A handwritten signature in blue ink that reads "Bryan Pope" followed by a stylized flourish.

Bryan Pope
Environmental Consultant
Division of Water Resources

cc: Ann Morbit, Nashville Environmental Field Office
Robbie Karesh, Nashville Central Office